

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JACK ROGERS,
and PAUL PINELLA,

Plaintiffs,

v.

COMCAST CORPORATION
and AT&T BROADBAND,

Defendants.

No. 04-10142 EFH
Hon. Edward F. Harrington

FILED
Clerk's Office
U.S.D.C. Mass.
Date 5-12-04
By [Signature]
Deputy Clerk

DEFENDANTS' MOTION FOR PROTECTIVE ORDER

Defendants, Comcast Corporation and AT&T Broadband,¹ pursuant to Rule 26(c) and D. Mass. LR 37.1, move for entry of a protective order related to deposition topics and certain categories of documents listed in the Notice of Rule 30(b)(6) Deposition to Defendants (the "30(b)(6) Deposition Notice"). The grounds for this motion are more fully set forth in accompanying Memorandum of Law in Support of Motion for Protective Order.

WHEREFORE, Defendants respectfully request that the Court enter a protective order that discovery requested in Plaintiffs' Notice of Rule 30(b)(6) Deposition to Defendants not be had, or that the scope of discovery related to the matters identified in the 30(b)(6) Deposition Notice be limited.

REQUEST FOR ORAL ARGUMENT

Pursuant to Rule 7.1(D) of the Local Rules of the United States District Court of the District of Massachusetts, Defendants request oral argument on this motion. Defendants believe that oral argument will assist the Court in resolving the issues in dispute.

¹ All Defendants make a special appearance for purposes of this Motion for Protective Order and reserve all rights they may have to challenge personal jurisdiction over them.

DATED this 11th day of May, 2004.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Berthiaume', written over a horizontal line.

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

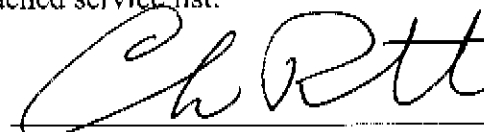
Pursuant to Local Rule 7.1(A)(2), I hereby certify that counsel for Defendants conferred in good faith with counsel for the Plaintiffs on May 11, 2004 in an attempt to narrow or resolve the issues addressed by this motion.



Christopher F. Robertson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of May, 2004, the foregoing was served via Facsimile and U.S. Mail upon the parties on the attached service list.



Christopher F. Robertson

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